

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION**

PRESIDENT DONALD J. TRUMP,
45th President of the United States of
America, in his individual capacity,

Plaintiff,

v.

SIMON & SCHUSTER, INC., a New
York corporation, ROBERT
WOODWARD p.k.a. BOB
WOODWARD, an individual, and
PARAMOUNT GLOBAL, a Delaware
corporation f/k/a VIACOMCBS, INC., a
Delaware corporation, f/k/a Viacom Inc.,
successor by merger to CBS Corporation,
a Pennsylvania corporation f/k/a
Westinghouse Electric Corporation,

Defendants.

Civil Action Number:
3:23-cv-02333-RV-ZCB

**MOTION FOR ADMISSION
*PRO HAC VICE***

Pursuant to Local Rule 11.1(C), Defendants Bob Woodward, Simon & Schuster, Inc., and Paramount Global move for the admission *pro hac vice* of Leena Charlton, a licensed member of the New York Bar. Ms. Charlton has undertaken the representation of Defendants in this matter as counsel. In support of this motion, Defendants state as follows:

1. Leena Charlton resides in New York.

2. Ms. Charlton is licensed to practice law in New York and is a member in good standing of the New York Bar. A true and correct copy of Ms. Charlton's Certificate of Good Standing from the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department is attached hereto as Exhibit A.

3. Ms. Charlton is an associate at the law firm Davis Wright Tremaine LLP, 1251 Avenue of the Americas, 21st Floor, New York, NY 10020.

4. Davis Wright Tremaine was retained by Defendants to provide legal representation in connection to the above-captioned action before this Court. Should the Court grant this motion, she and Davis Wright Tremaine will represent Defendants as co-counsel in this case with Joseph Jacquot from the law firm, Gunster, Yoakley & Stewart, P.A., One Independent Dr., Suite 2300, Jacksonville, FL 32202.

5. Ms. Charlton is not a member of The Florida Bar and does not maintain any law office in Florida.

6. Ms. Charlton studied and is familiar with the Local Rules of this District. She further certifies she successfully completed the Attorney Admission Tutorial for the Northern District of Florida and has reviewed the CM/ECF Attorney User's Guide. (Confirmation #: FLND1678470592247).

7. Ms. Charlton agrees to comply with the provisions of the Florida Rules of Professional Conduct, the Federal Rules of Civil Procedure, the Federal Rules of

Evidence, the Federal Rules of Appellate Procedure, and the Local Rules of this Court and understands she shall be subject to the disciplinary jurisdiction of this Court.

8. Ms. Charlton certifies that she has never been subject to any suspension or disbarment proceedings.

9. Ms. Charlton has an active, upgraded PACER account. She requests authorization to receive electronic notices of filing. Her email address is leenacharltion@dwt.com.

10. Ms. Charlton is paying the required \$208.00 *pro hac vice* fee for this case at the time of filing.

WHEREFORE, Defendants respectfully requests that this Court enter an order granting this motion and permitting Ms. Charlton to appear *pro hac vice* in this case.

/s/ Leena Charlton
LEENA CHARLTON
New York Bar No. 5622147
Davis Wright Tremaine LLP
1251 Avenue of the Americas, 21st Fl.
New York, New York 10020
(212) 489-8230
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Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2023, I electronically filed the forgoing with the Clerk of Court by using CM/ECF, which automatically serves all counsel of record for the parties who have appeared.

/s/ Leena Charlton

LEENA CHARLTON

New York Bar No. 5622147

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